

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2019-281-S**

IN RE:

Application of Palmetto Utilities,	)	
Incorporated for Adjustment (Increase) of	)	<b>SOUTH CAROLINA OFFICE OF</b>
Rates and Charges, Terms and Conditions,	)	<b>REGULATORY STAFF'S EXPEDITED</b>
for Sewer Service Provided to Customers	)	<b>MOTION FOR LEAVE TO FILE A</b>
in its Richland and Kershaw County	)	<b>CONSOLIDATED RESPONSE</b>
Service Areas	)	

The South Carolina Office of Regulatory Staff (“ORS”) respectfully moves the Public Service Commission of South Carolina (“Commission” or “PSC”) for leave to file one consolidated response to the two filings made by Palmetto Utilities, Inc. (“PUI”) on June 5, 2020: the Return to Office of Regulatory Staff Motion for Leave to File Testimony and Exhibits Under Seal (“Return”) and the Motion to Strike Portions of the Pre-Filed Direct Testimony and Exhibits of Charles E. Loy, Daniel P. Hunnell, II, and Christina L. Seale and for Imposition of Sanctions (“Motion to Strike”).

The Return and the Motion to Strike both deal with ORS’s use of materials and information ORS received through its requests for production pursuant to § 58-4-55. As the arguments relative to the Return and the Motion are intertwined, ORS believes the filing of one consolidated response would best serve judicial economy and will not prejudice any party. Due to the overlapping nature of the two filings, and with the consent of all parties to this Docket, ORS seeks expedited

permission from the Commission to file one consolidated response. ORS would further request that the Commission establish June 15, 2020<sup>1</sup> as the date which the ORS pleading is due.

Respectfully submitted,

*s/ Jenny Pittman*

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June 9, 2020

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<sup>1</sup> South Carolina Code Regs. 103-829 provides that ORS's reply to PUI's Return shall be filed with the Commission within five days of service and ORS's response to PUI's Motion to Strike shall be filed within ten days of service. ORS was served with PUI's Motion on June 8, 2020; therefore a June 15, 2020 filing deadline would not allow ORS additional time outside of what is provided by S.C. Code Regs. 103-829.